



**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**  
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**DIVISION OF ENFORCEMENT**

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**BY CM-ECF**

Hon. Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2550  
New York, NY 10007-1312

Re: SEC v. Lidingo Holdings LLC, et al. 17-CV-02540 (CM)

Dear Judge McMahon:

I represent the Securities and Exchange Commission ("SEC") in the above-referenced action. With the consent of all parties to this case, and pursuant to Section I.D. of Your Honor's Individual Practices and Procedures, I write to request an extension of the November 17, 2017 discovery cutoff date, and the January 2, 2018 date for submitting to the Court a proposed joint pre-trial order.

On May 31, 2017, when this Court entered the Civil Case Management Plan, there were no dispositive motions pending. Subsequently, Lidingo Holdings, LLC, Kamilla Bjorlin, Andrew Hodge, and Brian Nichols moved to dismiss the SEC's claims on various grounds, and Vincent Cassano moved to transfer the case to a different District. Those motions are currently pending. Although a limited amount of discovery has occurred, the parties believe that, for discovery to be conducted most efficiently and effectively, it is important to have a ruling on the pending motions and for defendants to file answers and affirmative defenses; and, once that occurs, the current deadlines will need to be extended so that the parties may adequately prepare for trial. The parties have discussed this issue and have executed the attached stipulation. Subject to the Court's approval, the parties agree that they shall have six months from the date on which the last answer and affirmative defense is filed to complete discovery, and 45 days from the completion of all discovery to file a proposed joint pre-trial order.

This is the first request for an extension of the discovery cutoff date and the joint pre-trial order submission date. This request does not affect another other dates on the Civil Case Management Plan. If the November 17 discovery cutoff is not extended, the parties will need to serve final requests for admission and contention interrogatories, on or before October 18, 2017.

Accordingly, we respectfully request that the Court grant the extension, so-Order the attached Stipulation, and enter the attached proposed Revised Civil Case Management Plan. Exhs. 1, 2.

Respectfully submitted,



Suzanne J. Romajas

Cc: Edward Gartenberg, Esq. (by CM-ECF)  
Philip D. Bartlett, Esq. (by CM-ECF)  
Vincent Cassano, *pro se* (by email)